

# EXHIBIT 19



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**

WELLCOMEMAT, LLC,

*Plaintiff,*

v.

AYLO HOLDINGS S.à r.l., AYLO  
FREESITES LTD, AYLO PREMIUM LTD,  
9219-1568 QUEBEC, INC., and JARROD  
BELTRAN,

*Defendants.*

C.A. No. 2:23-cv-483-JRG-RSP

JURY TRIAL DEMANDED

**DEFENDANTS AYLO HOLDINGS S.A.R.L., AYLO FREESITES LTD, AYLO  
PREMIUM LTD, AND 9219-1568 QUEBEC, INC.'S FIRST SUPPLEMENTAL  
OBJECTIONS AND RESPONSES TO PLAINTIFF WELLCOMEMAT'S  
SECOND SET OF VENUE INTERROGATORIES (NOS. 4-5)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, the Local Rules of the Eastern District of Texas, and Magistrate Judge Roy S. Payne's Order Granting Motion for Venue Discovery (Dkt. No. 24), Defendants Aylo Holdings S.à r.l., Aylo Freesites Ltd, Aylo Premium Ltd, and 9219-1568 Quebec, Inc. (collectively, "Defendants") hereby provide their first supplemental responses and objections to Plaintiff WellcomeMat, LLC's ("WellcomeMat") Second Set of Interrogatories ("Interrogatories")

**PRELIMINARY STATEMENT**

Defendants make the following responses in good faith after diligent inquiry into the facts, documents, and information presently available and specifically known to Defendants. Because Defendants' investigation, research, and analysis of the documents, facts, and information relating to this case is ongoing, it is likely that additional facts, documents or information will be disclosed

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Discovery is ongoing and Defendants reserve the right to amend and/or supplement this response, as well as identify documents under Federal Rule of Civil Procedure 33(d).

**INTERROGATORY NO. 5**

Identify by name, location, job description, employer, and dates of employment each person in the United States who directly or indirectly performed or controlled any content moderation of the Accused Websites, including by reviewing, adding, removing, and/or modifying Action Tags on the Accused Websites, at any point from October 13, 2017, to present.

**RESPONSE:**

In addition to the foregoing General Objections, which are incorporated fully by reference herein, Defendants object that the term “Accused Websites” is not defined. Defendants further object that this Interrogatory is vague and ambiguous as the terms “performed” and “controlled” are undefined and it is not clear how they differ from each other. Defendants further object that the use of the term “content moderation” is vague and ambiguous as it is unclear how or why WellcomeMat considers “reviewing, adding, removing, and/or modifying Action Tags” to be a form of “content moderation.”

Subject to and without waiving the foregoing General and Specific Objections, and after reasonable investigation, Defendants respond as follows:

For the sake of completeness, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] This Interrogatory appears to be based on a misunderstanding by WellcomeMat, as evidenced by its March 11, 2024, Infringement Contentions and as discussed with WellcomeMat during the Parties' meet and confer of April 16, 2024. On page 36 of its Infringement Contentions, WellcomeMat quotes from a Pornhub blog post entitled "Crash Course: How to Use Metadata, Tags, & Categories" that states "If our moderation team finds the tags or categories chosen to be inaccurate, appropriate tags and categories will be added to improve user experience" (emphasis added). WellcomeMat appears to believe that the word "tags" in this blog post refers to action tags, which is mistaken and incorrect. Instead, "tags" refers to video tags, which are described, for example, here: <https://help.pornhub.com/hc/en-us/articles/4419860542483-Video-Tags>. A video tag indicates the content of the video in its entirety (*e.g.*, this video relates to "Missionary") whereas an action tag indicates when a sexual act begins in a video (*e.g.*, "Missionary" begins at 01:30 in this video). Video tags are added during video upload and may be subject to content moderation whereas action tags, prior to July 7, 2023 (when it was still possible to manually add action tags) were not subject to content moderation and, moreover, could only be added after the video was already approved by content moderators.

Dated: June 4, 2024

Respectfully submitted,

OF COUNSEL:

/s/ Ralph A. Dengler

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*Attorneys for Defendants Aylo Holdings S.à. r.l.,  
Aylo Freesites Ltd, Aylo Premium Ltd, and  
9219-1568 Quebec Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 4, 2024, I caused a true and correct copy of the foregoing document to be served all counsel of record via e-mail, pursuant to the Federal Rules of Civil Procedure.

/s/ Ralph A. Dengler

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**VERIFICATION OF IBRAHIM SABBAGH**

I, Ibrahim Sabbagh, do hereby declare as follows:

1. I am employed by 9219-1568 Quebec, Inc. as Vice President of Engineering, and am authorized to make this verification on behalf of Aylo Holdings S.à r.l., Aylo Freesites Ltd, Aylo Premium Ltd, and 9219-1568 Quebec, Inc. (collectively, the “Aylo Defendants”).
2. I have read the Aylo Defendants’ First Supplemental Objections and Responses to Plaintiff WellcomeMat’s Second Set of Interrogatories (Nos. 4-5), and know its contents.
3. I verify that the foregoing responses to Interrogatory Nos. 4-5 are true and accurate to the best of my knowledge.

**I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.**



Ibrahim Sabbagh

Date: June 19, 2024